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November 16, 2009

Via First Class Mail and Email
Bruce R. Ewing, Esquire
DORSEY & WHITNEY, LLP
250 Park Avenue
New York, New York 10177

RE: The Ritz Hotel, Ltd. v. Shen Manufacturing Company Incorporated
Civil Action No. 05-CV-04730
Our File: Shen E-2460
Your Ref.: 457417-00020

Dear Bruce:

We are transmitting herewith Shen's objections to RHL's trial exhibits. Also enclosed are Shen's deposition designations for the depositions that Shen plans to use at trial and counter designations of Michelle Alfandari. Please be advised that we did not understand the October 23rd Order to require that we would designate the depositions, receive your counter-designations and meet and confer on objections to take place before October 26, 2009. Shen will seek leave to use these depositions at trial. We note that you have a motion to preclude the use of depositions by Shen, but notwithstanding, if you have counter-designations and or objections, please provide them.

Sincerely yours,



Frank J. Bonini, Jr.

FJB/njs

Enclosure

cc: Lile H. Deinard, Esquire
Christopher Scott D'Angelo, Esquire
Christina D. Frangiosa, Esquire
Mitchell R. Schrage, Esquire
R. Tali Epstein, Esquire

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE RITZ HOTEL LIMITED
Plaintiff/Counterclaim Defendant

CIVIL ACTION

2:05-cv-04730 (NS)

v.

SHEN MANUFACTURING COMPANY
INCORPORATED,
Defendant/Counterclaim Plaintiff

**SHEN MANUFACTURING COMPANY INCORPORATED'S DEPOSITION
DESIGNATIONS AND COUNTER DESIGNATIONS**

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The Ritz Hotel Limited's Designations:

Witness	RHL's Designations	Shen's Counter	Objections
Michelle Alfandari			
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Date: November 16, 2009

Respectfully submitted,
HARDING, EARLEY, FOLLMER & FRAILEY

s/Frank J. Bonini, Jr./

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*Attorneys for Defendant Counterclaim-Plaintiff
Shen Manufacturing Company, Incorporated*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing SHEN MANUFACTURING COMPANY INCORPORATED'S DEPOSITION DESIGNATIONS were served on this 16th day of November 2009, by sending the same electronically to:

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